

**REMARKS**

Claims 1-20, all the claims pending in the application, remain rejected on prior art grounds.

***Claim Rejections - 35 U.S.C. § 102(e)***

The Examiner has maintained the rejection of claims 1, 3-4, 6, 10-11, 13-15, and 20 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent Application Publication No. 2002/0107973 to Lennon et al. (hereinafter “Lennon”). Applicants traverse the rejection at least for the following reasons.

For example, claim 1 recites, in part:

“a mapping module for converting received external digital content metadata into digital content metadata peculiar to a network; and  
a search module for locating a method of accessing a program in a predetermined manner using a unique identifier assigned to each program in the received external digital content metadata after the received external digital content metadata is converted by the mapping module.”

On page 3 of the Final Office Action, the Examiner asserts that Lennon’s URI corresponds to the claimed unique identifier. However, Lennon discloses that this URI initiates access of the metadata (paragraph 71). In other words, the URI link is used to retrieve the metadata from legacy database 210 (paragraph 73). The URI link is not located after the conversion of the metadata. Indeed, the alleged unique identifier (URI) is used to access the metadata prior to the retrieval of the metadata from legacy database 212, and thus prior to the

converting of the retrieved metadata. Thus, Lennon does not teach or suggest a search module for locating a method of accessing a program in a predetermined manner using a unique identifier assigned to each program in the received external digital content metadata after the received external digital content metadata is converted by the mapping module, as recited by claim 1.

Because Lennon does not teach all of the features of claim 1, Applicants submit that the claim is not anticipated by Lennon. Applicants further submit that claim 3 is patentable at least by virtue of its dependency on claim 1.

Independent claims 4, 11, 14 and 15 recites features similar to those discussed above in conjunction with claim 1. Accordingly, Applicants submit that these claims are patentable at least for reasons analogous to those discussed above regarding claim 1. Applicants further submit that claims 3, 6, 10, 13, and 20 are patentable at least by virtue of their dependency on one of claims 4, 11, 14, and 15

***Claim Rejections - 35 U.S.C. § 103(a)***

The Examiner has maintained the rejection of claims 2, 7-9, 12, and 17-19 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lennon in view of Applicant's alleged admitted prior art (hereinafter "APA"). Because these claims are dependent on one of claims 1, 4, 11, 14, and 15, and because APA does not cure the deficiencies of Lennon, Applicants submit that the claims are patentable at least by virtue of their dependency.

The Examiner has rejected claims 5 and 16 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lennon in view of U.S. Patent Application Publication No. 2002/0199188 to

Sie et al. (hereinafter "Sie"). Because these claims are dependent on one of claims 4 and 15, and because Sie does not cure the deficiencies of Lennon, Applicants submit that the claims are patentable at least by virtue of their dependency.

***Conclusion***

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

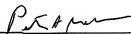
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CUSTOMER NUMBER

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